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Attorneys for Defendant  
**DAVID NUNN**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No. 6:20-PO-00742-HBK

Plaintiff,

## **JOINT MOTION TO EXTEND MOTION SCHEDULE; [PROPOSED ORDER]**

VS.

DAVID NUNN

**Defendant.**

## MOTION

The parties, through their respective counsel, Sean O. Anderson, Yosemite National Park Legal Officer, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender, counsel for the defendant, David Nunn, hereby jointly move this Court to extend the instant motion schedule, defendant's opening brief to be due on April 25, 2021.

Mr. Nunn was arraigned on January 12, 2021 before the Honorable Helena Barch-Kuchta. The government timely provided initial discovery. At the status conference on March 9, 2021, Judge Barch-Kuchta set a motion schedule, defendant's opening brief due April 6, 2021. On April 4, 20201, Defense counsel moved the court to extend the deadline for the opening brief to allow compliance and review of an additional discovery request. The government provided the additional discovery on April 14, 2021. Because the instant motion involves a complex analysis of administrative law and procedure, defense counsel again respectfully requests that the deadline of

1 the initial filing be extended until April 25, 2021 to complete legal research in light of the newly  
2 provided discovery. The government does not object.

3 Respectfully submitted,

4 Dated: April 20, 2021

5 /s/ Sean O. Anderson  
SEAN O. ANDERSON  
6 Legal Officer Yosemite National Park

7 Dated: April 20, 2021

8 HEATHER E. WILLIAMS  
Federal Defender

9 /s/ Benjamin A. Gerson  
10 BENJAMIN A. GERSON  
Assistant Federal Defender  
Attorney for Defendant  
David Nunn

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12 **O R D E R**

13 **GOOD CAUSE APPEARING**, the joint motion to extend the deadline for submission  
14 of the defendant's opening brief from April 20, 2021 to April 25, 2021 is granted.

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17 Dated: April \_\_\_\_\_, 2021

18 HON. HELENA M. BARCH-KUCHTA  
United States Magistrate Judge